

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

PUBLIC INQUIRY ON MODIFICATION OF SERVICE
PERFORMANCE MEASUREMENT SYSTEMS FOR
ADDITIONAL MARKET DOMINANT PRODUCTS

Docket No. PI2019-1

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
QUESTIONS 1 - 3 OF CHAIRMAN'S INFORMATION REQUEST NO. 1**
(June 25, 2020)

The United States Postal Service (Postal Service) hereby provides its response to the above-listed questions of Chairman's Information Request No. 1, issued on June 19, 2020. Each question is stated verbatim and followed by the response.

Respectfully submitted,
UNITED STATES POSTAL SERVICE
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June 25, 2020

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1. With respect to the Green Card option of Return Receipt service, please confirm that the Postal Service has internal measures or processes to hold employees accountable for compliance with the updated instructions regarding procedure upon the triggering of a sampling request to verify signature capture.¹
 - a. If confirmed, please identify these internal measures or processes and describe how they hold employees accountable for adherence to the updated instructions.
 - b. If not confirmed, please identify what internal measures or processes the Postal Service plans to implement and the expected timeframe for implementation.

RESPONSE:

- a. Confirmed.

Headquarters (HQ) Delivery Operations revised and disseminated a Standard Work Instruction (SWI) to reflect the process flow for delivery of PS-Form 3811 – Return Receipt in order to improve employee compliance and ensure accountability. In addition, HQ Delivery Operations created a specific process flow that demonstrates proper handling of sampling requests. A mandatory Stand Up talk (SUT) was issued via MyPO to all Delivery & Retail units, and the training materials for scanning PS-Form 3811 were updated for the Postal Service's Carrier Academies. Continuous improvement of these initiatives will make the system more accurate, reliable, and representative.

¹ See Library Reference USPS-LR-PI2019-1/6, June 12, 2020, PDF file "Preface LR 6 (Special Services).pdf," at 2.

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The Weekly Return Receipt Metric report is currently disseminated to Area Manager Delivery Program Support on a bi-weekly basis, starting in May 2020, in order to identify offices not performing as expected with this task.

b. Not applicable

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2. With respect to the Green Card option of Return Receipt service, please confirm that the Postal Service plans to revise the audit plan² to specifically measure or include employee compliance with updated instructions regarding procedure upon the triggering of a sampling request used to verify signature capture.
- a. If confirmed, please describe the expected audit criteria (yardstick) and state the expected timeframe for implementation.
 - b. If not confirmed, please state whether it is the Postal Service's position that the audit plan cannot be revised to include this measure and provide all reason(s) in support of this position.

RESPONSE:

- a. Confirmed.

The internal Service Performance Measurement (SPM) system for the Green Card option of Return Receipt service was designed by the Postal Service's third-party vendor³. To ensure sampling reflects statistically valid scores, analysis showed that 0.1% of the total volume within each quarter is to be sampled. This fraction is used to measure compliance for Audit Measure 28.⁴ In order to meet the 0.1% target and account for non-response and technical issues, at least 3 times the volume of samples is requested. The internal measurement system

² See Library Reference USPS-LR-PI2019-1/6, PDF files "FY20 Q1 Audit Return Receipt Add.pdf," at 6-11 and "FY20 Q2 Audit Return Receipt Add.pdf," at 7-12.

³ The same third-party vendor also designed and manages the legacy Return Receipt Measurement System.

⁴ Audit Measure 28: Validate that the data shows the sampling rate is at 95 percent of the expected sampling fraction compared to the total population for the quarter.

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observes this recommendation, meaning that a 33% response rate is currently used to produce statistically valid scores.

The Postal Service will be adding Audit Measure 29 to track compliance of Return Receipt sampling at the national level. As indicated above, the following metrics will ensure statistically valid scores:

Achieved: $\geq 33.0\%$

Partially Achieved: $\geq 30.0\%$, $< 33.0\%$

Not Achieved: $< 30.0\%$

The Postal Service will coordinate with its independent third party auditor to incorporate new Audit Measure 29 in its audit plan. The Postal Service plans to implement this change for its FY20 Q3 audit report.

b. Not applicable

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3. Please explain how the audit plan validates the reliability and accuracy of service performance data generated for the Green Card option of Return Receipt service.⁵

RESPONSE:

Current audit measures will be used to validate the reliability and accuracy of service performance data generated for the Green Card option of Return Receipt service. Audit Measures 1 and 4 will be used for accuracy and to monitor that employees are trained at sufficient levels in each district. Audit measure 6 will be used for accuracy and to ensure that Quarterly verification of requirements and report contents occur. Audit measure 13 will be used for reliability by reviewing documentation of systems' modifications and validating availability and robustness. Audit measure 14 will be used to review method and process changes, as well as PRC Report narratives for reliability. Audit Measures 16 and 17 will also measure data reliability for quarterly reporting and ensure data are frozen for the quarter and maintained. These audit measures will also validate that there is a process to close the quarterly reporting period.

⁵ See Order Conditionally Authorizing the Postal Service to Proceed with Changes to its Market Dominant Service Performance Measurement Systems, July 17, 2019, at 10, 14 (Order No. 5157).